



*United States Attorney  
Southern District of New York*

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March 22, 2021

**BY ECF & ELECTRONIC MAIL**

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)**

Dear Judge Nathan:

In accordance with the Court's March 18, 2021 order (the "Order"), the parties have met and conferred regarding proposed redactions to Exhibit 11 and the defendant's cover letter dated March 9, 2021. The parties have reached agreement regarding redactions as to Exhibit 11 and the defendant's cover letter. The parties do not believe any redactions are needed as to the defendant's cover letter. The parties' proposed redactions to Exhibit 11 are submitted under seal for the Court's consideration.

The Government intends to file its omnibus memorandum of law and the corresponding exhibits consistent with the Court's Order, with one exception to which the defense consents. In particular, the defense has indicated that it no longer wishes the Government to remove the redactions the Government had originally proposed to pages 118 to 119 of the Government's brief. Those redactions refer to and quote from portions of an exhibit filed under seal by the defense and which the Government understands is filed under seal in *Giuffre v. Maxwell*, 15 Civ. 7433 (LAP). Accordingly, the Government has kept those redactions in the attached omnibus memorandum of law.

Additionally, and mindful of the presumption of public access, the Government notes that some of the defense's proposed redactions which the Court adopted in the Order include language

